

FILED

JAN 10 2011

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UNITED STATES DISTRICT COURT
MISSOULA DIVISION, DISTRICT OF MONTANA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

WILLIAM RICHARD NIELSEN

CASE NUMBER: ^{MO}11- 7-M-JCL

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about January 5, 2011, in Missoula County, in the State and District of Montana, defendant, WILLIAM RICHARD NIELSEN, did knowingly persuade, induce, entice, and coerce a twelve year old female, name withheld for privacy, to travel in interstate commerce to engage in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a).

1. I, Monte Shaide, am a Special Agent (SA) of the Federal Bureau of Investigation and am currently assigned to the Missoula Resident Agency in Missoula, Montana. I have been employed as an SA for over thirteen years and in that time have had extensive training and experience in conducting violent crime investigations, to include crimes against children. I am assigned to the following investigation and the information contained in this affidavit is based on my own observation, training, and experience, and where noted, information provided to me by other law enforcement officers.

2. On January 7, 2011, Jeff Jaramillo, the father of a 12 year old female, name withheld and hereinafter referred to as "the victim", came into the Missoula Police Department to seek an investigative subpoena for the victim's cell phone information. Jeff had reported the victim missing to the Sheridan, Wyoming Police Department. Jeff believed that the victim was currently in the Missoula area. Jeff was advised by the Missoula Police Department that his request must be reported through the local law enforcement agency in Sheridan, Wyoming.

3. On January 9, 2011, at approximately 9:57am, Missoula Police Department officers were dispatched to The Bridge Apartments located at 1205 West Broadway, to the report of a disturbance involving multiple individuals. Officers arrived and found Jeff Jaramillo, Bobbie'Jo Marshall, Amanda Lynn, Bobbi Brooks, the victim, and WILLIAM NIELSEN in the front of the building. Jeff was accusing NIELSEN of having sex with the victim.

4. Jeff explained to officers that he and his ex-wife, Bobbie'Jo Marshall, realized their daughter had ran away and boarded a Greyhound Bus from Sheridan, Wyoming to Missoula, Montana, on January 5, 2011. Jeff and Bobbie'Jo further investigated their daughter's disappearance and discovered their daughter had been talking to a guy in Missoula on her

MySpace page. Initially, Jeff and Bobbie'Jo did not know very much information about him but eventually located NIELSEN by secretly posing as one of the victim's friends on MySpace.

5. Under this "persona", Jeff stated they advised NIELSEN they had drugs available. Jeff stated NIELSEN was excited to have more drugs and met Jeff (thinking he was "the friend") at NIELSEN's place of residence, The Bridge Apartments. Jeff also advised officers that when he entered NIELSEN's apartment (#8) he found the victim naked and lying on NIELSEN's bed.

6. When officers spoke with the victim, she explained she had made contact with NIELSEN about three weeks ago on MySpace and was pressured into purchasing a bus ticket to Missoula in order to meet NIELSEN. The victim stated she arrived at the bus terminal in Missoula about 4 days earlier and was met by NIELSEN. NIELSEN asked her what her name was. After she said her name, NIELSEN grabbed her arm and walked her over to his apartment, which is located nearby. After the victim entered NIELSEN's apartment, NIELSEN locked the door and had sex with her during all four days. The victim said she tried to leave, but NIELSEN told her she could not. The victim stated that NIELSEN provided her with marijuana and marijuana laced brownies.

7. Missoula Police Detectives responded to the scene and identified WILLIAM RICHARD NIELSEN as a registered sex offender. He was previously convicted of sexual assault in Montana District Court. His prior victim was a 12 year old female. NIELSEN is a 24 year old white male, date of birth 06/03/1986, who stands 6'4" and is 370 pounds.

8. The victim was escorted by her family and Missoula Police Officers to the hospital where she was medically treated. The victim informed the staff that she suffered from vaginal bleeding as NIELSEN penetrated her numerous times with his penis and a dildo. The victim also had numerous bruises and marks on her body consistent with slapping, biting, and sucking.

9. Missoula Police Detective Dean Chrestenson and Missoula Police Detective Guy Baker contacted me regarding the above matter and requested FBI assistance. I responded to the Greyhound Bus Terminal and obtained records regarding the victim's travel from Sheridan, Wyoming. The victim used NIELSEN's last name and purchased a \$107 one-way bus ticket, using cash, from Sheridan, Wyoming to Missoula, Montana on the evening of January 4, 2011. Records indicate the victim departed from Sheridan on January 4, and arrived in Missoula on January 5, 2011 at 8:15am.

10. Detective Chrestenson and Detective Baker interviewed the victim at the Missoula Police Department. The victim stated that she met NIELSEN via MySpace.com approximately three weeks ago. After she met NIELSEN on MySpace, they went to a chat room. The chat room was for individuals 18 years and older. The victim initially lied about her age to get into the chat room. Once in the chat room, NIELSEN and the victim exchanged cell phone numbers. The victim and NIELSEN started "sexting" back and forth and engaged in phone sex on at least one occasion. The victim then informed NIELSEN that she was only twelve years old. NIELSEN told the victim that he was a registered sex offender and could get into trouble. NIELSEN then told the victim that it could be their little secret and no one needed to

know. NIELSEN "sexted" and engaged the victim in phone sex numerous times after NIELSEN knew she was only twelve. NIELSEN asked the victim to come to Montana to see him. NIELSEN promised the victim drugs and a good time. The victim said she was tired of school and asked NIELSEN how she would get to Missoula. NIELSEN instructed the victim to take the Greyhound Bus. NIELSEN sent the victim the bus schedule and instructed her on the date and time to leave. The victim followed NIELSEN's instructions. The victim used NIELSEN's last name so that she would not be identified as a juvenile. The victim grabbed some money, purchased a ticket, and left for Missoula the evening of January 4, 2010.

11. Upon her arrival, NIELSEN took the victim to his apartment, locked the door, and got the victim high on marijuana. NIELSEN took the victim's clothes off and engaged in sexual intercourse. The victim stated that NIELSEN penetrated her vagina with his penis, mouth, and a dildo. The victim also engaged in oral sex with NIELSEN. NIELSEN told the victim she was his little "fuck pet". On one occasion, the victim tried to leave but NIELSEN told her she was not going anywhere. The victim said she felt that she could not leave and was being held against her will. She said she felt "out of it" and high from drugs during her entire stay with NIELSEN. The victim estimated that NIELSEN had sexual intercourse with her up to five times a day for four days.

12. NIELSEN was initially interviewed by Detective Chrestensen and Detective Baker. During the interview, NIELSEN was deceptive regarding his knowledge of the victim's age and his solicitation of the victim from Wyoming to Montana. I asked NIELSEN if he would consent to an FBI polygraph examination. NIELSEN advised that he would submit to a test.


13. FBI Special Agent Stacey Smiedala, an FBI Polygraph Examiner, at my request responded to the Missoula Police Department and administered a polygraph examination on NIELSEN. Subsequent to the polygraph, NIELSEN advised SA Smiedala, Detective Baker, and I that NIELSEN knew the victim was twelve years old and still solicited her to come to Montana. When the victim arrived, NIELSEN got her high on marijuana and alcohol. He then engaged in oral and vaginal sexual intercourse several times a day. NIELSEN stated that he slapped her body region to include her breasts, buttocks, and vagina with his open hand. NIELSEN stated that he also bit and sucked on areas of her body. NIELSEN called her his "fuck pet" and ordered her to call him "daddy". NIELSEN admits to be into bondage and sadomasochistic activity. NIELSEN, being a registered sex offender, admitted that he knew he was in trouble. When NIELSEN was asked if he was ever going to let her go, NIELSEN replied that he probably could not let her go until she was eighteen years of age.

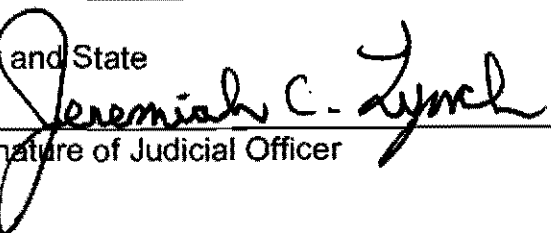
14. Based on the foregoing, there is probable cause to believe that WILLIAM RICHARD NIELSEN did knowingly persuade, induce, entice, and coerce a twelve year old female to travel in interstate commerce to engage in any sexual activity for which any person can be charged with a criminal offense, a violation of Title 18, United States Code, Section 2422(a). It is violation of § 45-4-503, M.C.A., for a person to have sexual intercourse without consent with another person. "Without consent" means the victim is incapable of consent because the victim is less than 16 years old.

() Continued on the attached sheet and made a part hereof

Missoula, MT 1/10/11
at Date

Jeremiah C. Lynch, U.S. Magistrate Judge
Name and Title of Judicial Officer


Monte Shaide, Special Agent
Federal Bureau of Investigation
Missoula, Montana

City and State

Jeremiah C. Lynch
Signature of Judicial Officer